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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO VENUE

UNITED STATES OF AMERICA,) **No. C 05-4185 SC**

Plaintiff,)

v.)

1. \$250,110 IN UNITED STATES)
CURRENCY, AND)

**STIPULATION REQUESTING
FURTHER STAY OF FORFEITURE
PROCEEDINGS**

2. REAL PROPERTY AND IMPROVEMENTS)
AT 166 LOS ROBLES DRIVE,)
BURLINGAME, CALIFORNIA)

Defendants.)

IT IS HEREBY STIPULATED by and between plaintiff United States of America and claimants Eric Cai, Zhoren Cai and CitiMortgage Inc., through undersigned counsel, that this action continue to be stayed pursuant to 21 U.S.C. § 881(j). Eric Cai, who has filed a claim contesting the forfeiture of the defendant property, has been charged by a criminal complaint with drug trafficking and money laundering offenses in the Northern District of California. The underlying criminal activity alleged in the criminal complaint forms, in large part, the basis for the forfeiture allegations in the government's amended complaint for forfeiture. Consequently, the parties agree that a stay in the forfeiture proceeding is appropriate in order to preserve Eric Cai's right against self-incrimination in the related criminal

**STIPULATION RE STAY OF FORFEITURE PROCEEDINGS
(ERIC CAI)**

1 matter. The parties thus request that matter be stayed pending resolution of the related criminal
 2 prosecution against Eric Cai. Accordingly, the parties request that the case management conference
 3 currently set for Friday, July 13, 2007, at 10:00 a.m. be vacated and that the matter be set for status on
 4 August 24, 2007, or as soon thereafter as the Court may hear this matter. Government counsel advises
 5 that she will be unavailable from September 1 -17, 2007.

6
 7 DATED: 07/09/07

/S/
 STEPHANIE M. HINDS
 Assistant United States Attorney

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 9
 10 DATED: 07/09/07

/S/
 RANDY MONTESANO
 Attorney for Eric Cai and Zhaoren Cai

11
 12
 13 DATED: 07/09/07

/S/
 MICHAEL H. CHANG
 Attorney for CitiMortgage Inc.

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 18 IT IS HEREBY ORDERED:

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 20 Upon the stipulation of counsel, and good cause appearing, the above-entitled civil forfeiture
 21 action is stayed in light of the pending related criminal prosecution of Eric Cai. The case management
 22 conference scheduled for July 13, at 10:00 a.m. is vacated. The matter is continued to
 23 9/7/07 @ 10:00 a.m. for status.

24
 25 DATED: 7/11/07



STIPULATION RE STAY OF FORFEITURE PROCEEDINGS
 (ERIC CAI)